

OPE Advertising with PROMOTIONAL FEES (Effective 9/20/17)

THIS VERSION IS FOR ADVERTISING IN PROGRAMS THAT:
DO HAVE PROMOTIONAL FEES AND DO NOT INCLUDE DEBT CAN FEES IN PROMO PURCHASE AMOUNT

Design Instructions: Refer to Advertising Guidelines for specific examples of creative options by channel. Information in brackets will vary depending on the specific promotion, and must be revised as appropriate. Add the specific promotion information before deleting the language and brackets.

Main Headline:

Main Headline must have a disclosure identifier at the end that ties to the corresponding supporting disclosure. Examples of commonly used disclosure identifiers include an asterisk, a dagger or a superscript number. The description of the promotional period in the headline must consistently be used in the advertisement, including the supporting disclosure. For example, if the headline states “No Monthly Interest for 48 Months”, the supporting disclosure must also use the 48 Month promotional period and not “4 Years”.

Subhead:

Subhead must immediately follow, be connected, or adjacent to the Main Headline.

Subhead needs to be a reasonable size in relation to headline, clear and conspicuous, but in no event less than 10pt font.

40% of the Main Headline size could be a good benchmark for subhead size.

Supporting Disclosure:

Minimum font size for supporting disclosure copy is 8pt, but increases as appropriate for the size and location of the advertisement. The disclosure must be easily readable, considering the size and format of the advertisement. The supporting disclosure must be preceded by the same disclosure identifier (asterisk, dagger, etc.) used at the end of the headline. The supporting disclosure may not contradict or take away from the general impression of the main headline or the subhead.

Single page document: Supporting disclosure needs to be on the same page as the headline/subhead. If disclosure is on the reverse/back side of the page, a redirect (see reverse, etc.) is required on the side of the document with the headline.

Multi-page document: Supporting disclosure can be on the same page or a different page of the document. If disclosure is not on the same page, a redirect (see page XX) is required on the page with the headline.

Website: Supporting disclosure on a webpage must be on the same page or *no more than one click away* from the headline and subhead.

Disclosure Identifiers:

If there is more than one headline in a document, then a different disclosure identifier must be used for each one so that a reader will be able to clearly tie each headline to its corresponding disclosure.

Redirects:

A redirect is a short statement on the same side of the page as the headline that tells the reader where to find the supporting disclosure. It is preceded by the same disclosure identifier used at the end of the headline and at the beginning of the supporting disclosure. For example:

A redirect in a single page document would read: *See reverse for more details or *See back for details.

A redirect in a multi-page document would read: *See page xx for more details or *See page XX for details.

A redirect on a webpage would read: Get Details or Get Info and would go directly to a finance page. (One click away.)

There are three types of advertising headlines typically used to promote Synchrony Bank financing offers: (1) Trigger/Promotional Headlines (include a trigger term such as “No Interest” or a specific APR); (2) Combo Headlines (no trigger terms are used in the headline, but a promotional period is included); or (3) Generic Headlines (neither a trigger term nor the promotional period are included).

TYPE OF PROMOTION	PROMOTIONAL (TRIGGER) HEADLINE, SUBHEAD & DISCLOSURE LANGUAGE	COMBO HEADLINE LANGUAGE	GENERIC HEADLINE LANGUAGE
<p>#1</p> <p>Equal Payment/No Interest (EPNI) until paid in full or with no expiration</p> <p><i>Description: This promotion does not expire. No interest is assessed on a promotional purchase and equal monthly payments are required until paid in full. Equal payments are a fixed percentage of the initial promotional purchase amount.</i></p> <p><i>Promo Fees: For promos with a duration of less than 12 months, there is 0 fee; promos 12-18 months, \$50 promo fee; promos 19 months or longer, \$150 fee.</i></p> <p><i>Design Specification: Reasonable variation is allowed in font/color/size, provided that key terms of the offer are presented in an understandable way for consumers. See</i></p>	<p>Main Headline Options (Select One)</p> <p>No monthly interest [for XX Months]* [until paid in full]</p> <p>[Zero] [0] [0%] monthly interest [for XX Months]* [until paid in full*]</p> <p>No monthly Interest until [Month, Year]*</p> <p>[Zero] [0] [0%] Monthly Interest until [Month, Year]*</p> <p>Subhead: On [insert product limitations] purchases [of \$XXX or more] made with your [PROGRAM] credit card [date] - [date]. [A [\$XX] Promotion Fee will be charged.] Equal monthly payments required for [XX] months [until month, year.]</p> <p>Supporting Disclosure: *[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] A promo fee will be charged and included in the promo purchase balance equal to \$50 for promos 12-18 months; \$150 for promos 19 months or longer. No monthly interest will be charged on promo purchase balance, including related promo fee, and equal monthly payments are required until promo is paid in full. These payments equal the initial promo purchase amount divided by the number of months in the promo period and rounded up to the next whole dollar. These payments may be higher than the payments that would be required if this purchase was a non-promo purchase. Regular account terms apply to non-promo purchases. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval.</p> <p>The HIGHLIGHTED portion of the subhead disclosure should be deleted when the duration of the promo is less than 12 months.</p>	<p>Main Headline XX Months [Promotional] Financing Available*</p> <p>Subhead: On [insert product limitations] purchases [of \$XXX or more] made with your [PROGRAM] credit card [date] - [date].</p> <p>Supporting Disclosure: *Subject to credit approval. Minimum monthly payments required. See store for details.</p>	<p>Main Headline [Special] [Promotional] Financing Available[*]</p> <p>Subhead: Not needed.</p> <p>Supporting Disclosure: *Subject to credit approval. Minimum monthly payments required. See store for details.</p> <p><i>Generic Disclosure and disclosure symbol are only required when the Program credit card name or image is mentioned or shown.</i></p>

TYPE OF PROMOTION	PROMOTIONAL (TRIGGER) HEADLINE, SUBHEAD & DISCLOSURE LANGUAGE	COMBO HEADLINE LANGUAGE	GENERIC HEADLINE LANGUAGE
#2 Fixed Payment/ Reduced APR until paid in full or with no expiration. Description: <i>This promotion does not expire. Interest is assessed on a promotional purchase at a reduced APR and fixed monthly payments are required until paid in full. Fixed payments are a fixed percentage of the initial promotional purchase amount.</i> Design Specification: <i>Reasonable variation is allowed in font/color/size, provided that key terms of the offer are presented in an understandable way for consumers. See Advertising Guidelines document for examples</i>	Main Headline Option XX.XX% APR [for XX Months] [until paid in full]* Subhead: On [insert product limitations] purchases [of \$XXX or more] made with your [PROGRAM] credit card [date] - [date]. [A \$XX] Promotion Fee will be charged. Fixed monthly payments required for [XX] months. Supporting Disclosure: *[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] A promo fee will be charged and included in the promo purchase balance equal to \$50 for promos 12-18 months; \$150 for promos 19 months or longer. Monthly interest will be charged on promo purchase balance, including related promo fee, from the purchase date at a reduced [XX.XX%] APR, and fixed monthly payments are required until the promo is paid in full. These payments are equal to [X.XX%] of initial promo purchase amount, and rounded up to the next whole dollar. These payments may be higher than the payments that would be required if this purchase was a non-promo purchase. Regular account terms apply to non-promo purchases. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X.] Existing cardholders: See your credit card agreement terms. Subject to credit approval. The HIGHLIGHTED portion of the subhead and disclosure should be deleted when the duration of the promo is less than 12 months.	Main Headline XX Months [Promotional] Financing Available* Subhead: On [insert product limitations] purchases [of \$XXX or more] made with your {PROGRAM} credit card [date] - [date]. Supporting Disclosure: *Subject to credit approval. Minimum monthly payments required. See store for details.	Main Headline [Promotional] Financing Available[*] Subhead: Not needed. Supporting Disclosure: [*Subject to credit approval. Minimum monthly payments required. See store for details.] <i>Generic Disclosure and disclosure symbol are only required when the Program credit card name or image is mentioned or shown.</i>

MONTHLY PAYMENT LANGUAGE (FOR EQUAL PAYMENT NO INTEREST OR FIXED PAYMENT REDUCED APR PROMOTIONS)

(Not for use with Deferred Interest Promotions)

Option 1

Main Headline (usually displayed next to related product):

\$XX.XX per month

For **X** months

\$XXX.XX total*

Promotional (Trigger) Headline/Combo Headline/Subhead: See NOTE below.

Option 2

Main Headline (usually displayed next to related product):

\$XX.XX per month*

Same page as Main Headline: Items in bold must be the same size as the monthly payment amount in the headline.

***X** months to pay off balance. **\$XXX.XX** total payments. [Click here for full details.] [See page x for full details.]

Promotional (Trigger) Headline/Combo Headline/Subhead: See NOTE below.

Supporting Disclosure (below) to be used (on same page if single page, alternative page if multi-page, or one click away if online):

For Equal Payment/No Interest Promotion: *The monthly payment shown equals the purchase price (excluding [taxes and delivery]) divided by the number of months in the promo period. It is rounded to the next highest whole dollar. It is only good for the financing shown. If you make these payments by the due date each month, you should pay off this purchase within the promo period, if it is the only balance you are paying off. If you have other balances on your account, this payment will be added to any other minimum monthly payments.

For Fixed Payment/Reduced APR Promotion: *Monthly payment shown is equal to the promo purchase price (excluding [taxes and delivery]) multiplied by X.XXX%, rounded to the next highest whole dollar, and only applies to the selected financing option shown. If you make your payments by the due date each month, the monthly payment shown should allow you to pay off this purchase within the promo period if this balance is the only balance on your account during the promo period. If you have other balances on your account, this monthly payment will be added to the minimum payment applicable to those balances.

NOTE: PROMOTIONAL (TRIGGER) HEADLINE/COMBO HEADLINE/SUBHEAD: Since the monthly payment assumes that: (1) a [program name] credit card is used, and (2) a specific Equal Payment No Interest or Fixed Payment Reduced APR promotion applies, those two material facts must be clearly and conspicuously (connected to the monthly payment) stated within the advertisement. A reasonable consumer needs to understand that they apply. Shown below are some suggestions.

- Include a subhead that says: “On your [program name] credit card with the [xx month] promotional financing** offer.”
- Include a subhead that says (i.e. if an equal payment no interest offer applies): “On your [program name] credit card with the No Interest for XX months** offer.”
- If multiple monthly payments are included in one ad and associated with the same promotional offer, include a sentence in the promotional offer subhead that says:
*Monthly payments shown are applicable with xx-month promotional financing** on your [program name] credit card.”

In each of the suggestions above, the ** must tie to the promotional headline, subhead and supporting disclosure as applicable.

TYPE OF PROMOTION	PROMOTIONAL (TRIGGER) HEADLINE, SUBHEAD & DISCLOSURE LANGUAGE	COMBO HEADLINE LANGUAGE	GENERIC HEADLINE LANGUAGE
#3 Deferred Interest Description: <i>Interest accrues on promotional purchase during promotional period and will be assessed if promotional purchase is not paid in full within promotional period. Minimum monthly payments are required.</i> Design Compliance: <i>For this type of promotion, font size must be the same for all language in the headline. Font size for all language in the sub headline must also be the same, and no smaller than 40% of the headline. See Advertising Guidelines document for examples.</i>	Main Headline No monthly interest if paid in full [within XX Months] [by Month, Year]* Zero [0] monthly interest if paid in full [within XX months] [by Month, Year]* Subhead: On [insert product limitations purchases] [of \$XXX or more] made with your [PROGRAM] credit card [Date] - [Date]. Interest will be charged to your account from the purchase date if the promotional purchase is not paid in full [within XX months] [by month, year]. [A [\$XX] Promotion Fee will be charged.] Minimum monthly payments required. Supporting Disclosure: *[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] A promo fee will be charged and included in the promo purchase balance equal to \$50 for promos 12-18 months; \$150 for promos 19 months or longer. No monthly interest will be charged on the promo purchase balance, including related promo fee, if you pay the promo purchase balance, including related promo fee, in full, within the promo period. If you do not, monthly interest will be charged on the promo purchase balance from the purchase date. The required monthly payments may or may not pay off the promo purchase by the end of the promo period. Regular account terms apply to non-promo purchases and, after promo period ends, to the remaining promo balance. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval. The HIGHLIGHTED portion of the subhead and disclosure should be deleted when the duration of the promo is less than 12 months.	Main Headline XX Months Promotional Financing Available* Subhead: On [insert product limitations] purchases [of \$XXX or more] made with your XXX credit card [date] - [date]. Supporting Disclosure: *Subject to credit approval. Minimum monthly payments required. See store for details.	Main Headline Special [Promotional] Financing Available[*] Subhead: Not needed. Supporting Disclosure: *Subject to credit approval. Minimum monthly payments required. See store for details. <i>Generic Disclosure and disclosure symbol are only required when the Program credit card name or image is mentioned or shown.</i>

OTHER DISCLOSURES	INSTRUCTIONS	DISCLOSURE LANGUAGE
No Down Payment; Nothing Down; Free Delivery, etc.	<p>This disclosure should be included if the consumer is not obligated to make a down payment, pay for delivery, etc. <u>only if they use the credit card</u>. It may be included in the promotional financing disclosure or be added as a standalone disclosure.</p> <p>If the benefit(s) is not tied to use of the card, that needs to be clear: separate the headline from any other credit card promotion in the ad.</p>	<p><i>*[insert related benefit] if the purchase is made with your [Credit Card Name] card.</i></p> <p><i>Example: *Free delivery if the purchase is made with your XYZ Sports Credit Card.</i></p> <p><i>Modify disclosure as needed. Additional restrictions or limitations may need to be added if applicable.</i></p>
No Annual Fee	<p>This phrase is a trigger term and therefore needs the disclosure at right. The disclosure must be tied to the phrase with an identifier, and added as a standalone disclosure when “no annual fee” is listed as a benefit of the financing credit card program. It could be added as part of the promotional financing disclosure.</p>	<p><i>*For new accounts: Purchase APR is [XX.XX%]; Minimum Interest Charge is \$2. A promo fee will be charged equal to \$50 for promos 12-18 months; \$150 19 months or longer.</i></p>
Rebates, Discounts, Coupons	<p>If a coupon, rebate or discount associated with the credit card will impact the qualifying purchase amount of a promotional financing offer, additional language needs to be added to the subhead and supporting disclosure.</p> <p><i>NOTE: If there is no minimum purchase qualification for the financing promotion, or if the qualifying minimum purchase amount is not reduced when a rebate, discount or coupon is used, then the additional language is not required.</i></p>	<p><i>Subhead language: “[Discounts; Rebates; Coupons] applied at time of purchase will reduce your total purchase amount.”</i></p> <p><i>Supporting Disclosure language: “Any discount, coupon, manufacturer rebate, or other promotional offer applied at time of purchase, will reduce your total purchase amount and may result in you not satisfying the minimum qualifying purchase amount required.”</i></p>
Credit Card Image/Text	<p>An option is to show the image of the credit card rather than including the name of the card in the subhead. The size and proximity of the image must clearly indicate to a reasonable consumer that the credit card needs to be used to get the promotion.</p>	
Everyday Offers	<p>When promoting an everyday offer, it is not required to include the language “made between [Date] and [Date]” in the subhead. However, it is required to add the line to the right to the end of the disclosure.</p>	<p><i>We reserve the right to discontinue or alter the terms of this offer any time.</i></p>